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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS OPPOSITION TO
DEFENDANT OTTO TRUCKING
LLC'S MOTION FOR A SEPARATE
TRIAL (DKT. 1933)**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Portions of Its Opposition to Defendant Otto Trucking LLC's Motion for a Separate Trial (Dkt. 1933).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Opposition	Red Boxes

3. The red boxes in Waymo's Opposition contain highly confidential information regarding a business agreement, including terms and conditions. This information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors and counterparties to gain insight into the structure and terms of Uber's business agreements, allowing them to tailor their own negotiation or business strategy to the detriment of Uber.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Administrative Motion and its supporting papers that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day of October, 2017 in San Francisco, California.

/s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 6, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ